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May 19, 2022

**VIA ECF**

The Hon. Katherine Polk Failla  
United States District Judge  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

**Re: Girotto v. Jil Sander USA Inc. and 96 Greene Street LLC**  
**Case No. 21-cv-10106 (KPF)**

Dear Judge Failla,

Our firm represents Defendant 96 Greene Street LLC (“96 Greene”) in the above-referenced action. Please accept this letter as our appearance in this action.

We write on behalf of 96 Greene and co-Defendant Jil Sander USA Inc., and with the Consent of Plaintiff, to request that the Court approve: (1) an extension of Defendants’ time to answer, move, or otherwise respond to the Complaint; and (2) an adjournment of the initial pretrial conference currently calendared for May 27, 2022. The reason for the requested extension and adjournment is that our office was just retained, and requires additional time to conduct an investigation and assess the relevant facts.

Additionally, Defendants have begun discussing possible early resolution of this matter with Plaintiff’s counsel, and require additional time to continue those settlement discussions. We therefore request an extension of time to respond to the Complaint until June 30, 2022, and for an adjournment of the initial pretrial conference to a date thereafter that is convenient for the Court.

This is Defendants’ first request for an extension of time to respond to the Complaint in this case. On February 17, 2022 and April 15, 2022—before our client was aware of this action<sup>1</sup>—the Court granted two letter requests for adjournments of the pretrial conference submitted by Plaintiff.

We thank the Court in advance for its consideration of this request.

Respectfully submitted,

/s/ Eliad S. Shapiro

cc: Ben-Zion Bradley Weitz, Esq. (via ECF)  
Michael L. Stevens, Esq. (via e-mail)

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<sup>1</sup> Our client never received service of the Complaint in this action, and was only made aware of this action when contacted by counsel for Jil Sander USA Inc., a few days ago.

Application GRANTED. Defendants' time to answer or otherwise respond to the Complaint shall be extended to June 30, 2022.

The initial pretrial conference presently scheduled for May 27, 2022, is hereby ADJOURNED to July 15, 2022, at 4:00 p.m. This conference will proceed telephonically. At the appointed time, the parties are to call (888) 363-4749 and enter access code 5123533.

The Clerk of Court is directed to terminate the pending motion at docket entry 14.

Dated: May 20, 2022  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE